

**M&B**  
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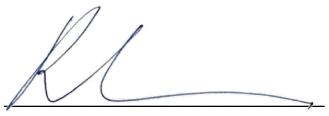
October 29, 2020

By ECF

Hon. Ronnie Abrams  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, N.Y. 10007

Application granted.

SO ORDERED.

  
Ronnie Abrams, U.S.D.J.  
10/29/20

Dear Judge Abrams:

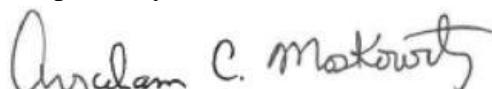
This letter is respectfully submitted on behalf of the defendant Hugh Dunkerley, to request a modification of his bail conditions to allow him to travel in the continental United States for business purposes.

Mr. Dunkerley is currently employed as the Sales Director for a logistics company which has Walmart as one of its clients. The company recently entered into a contract with Walmart to service stores outside of California, where Mr. Dunkerley currently resides. As part of his job, Mr. Dunkerley will be required to travel, often on short notice, to meet with representatives of Walmart in the various states where the firm is servicing Walmart stores. To avoid burdening the Court and Pretrial Services with repeated travel requests, we are requesting that the Court modify Mr. Dunkerley's bail conditions to allow him to travel on business throughout the continental United States.

I have been in contact with AUSA Mermelstein and with Mr. Dunkerley's Pretrial Services Officer and both have advised that they have no objection to the requested modification.

Thank you in advance for your consideration of this request.

Respectfully submitted,



Avraham C. Moskowitz

cc: AUSA Rebecca Mermelstein (by phone)